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210 N. Park Ave.

Winter Park, FL

Ms. Marlene H. Dortch

Secretary, Federal Communications Commission

445 12th Street SW

Washington, DC 20554

P.O. Drawer 200

Winter Park, FL

RE: WC Docket 06-36

32790-0200

EB-06-TC-060 - Certification of CPNI Filing

Tel: 407-740-8575

Dear Ms. Dortch:

Fax: 407-740-0613

tmi@tminc.com

Pursuant to the Commission's Public Notice of January 30, 2006, Interactive Services Network, Inc., d/b/a ISN Telcom hereby files a copy of its 2006 Annual CPNI Compliance Certification as required by section 64.2009(e) of the Commission's rules. As directed by the Public Notice, please include this in WC Docket 06-36.

To the extent deemed necessary by the Commission, ISN hereby requests a waiver/extension of the February 6th submission date included in the Public Notice. ISN believes that good cause exists for granting this four day waiver/extension filing.

Please contact me at 407-740-3008 or <u>cneeld@tminc.com</u> if you have any questions about this filing.

Sincerely,

Craig Neeld Consultant

cc:

Byron McCoy (byron.mccoy@fcc.gov)

Best Copy and Printing (fcc@bcpiweb.com)

J. Lieberman – ISN (paper)

to file: ISN - FCC

ANNUAL, OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

I, Jonathan Lieberman, certify and state that:

- 1. I am the President of and have personal knowledge of Interactive Services Network, Inc., d/b/a ISN Telcom operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
- 2. I hereby certify that, to the best of my knowledge, information and belief, ISN's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
- 3. A further statement outlining the ISN's operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)

Jonathan Lleberman, President

Date

Exhibit A Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance

ISN does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. ISN has trained its personnel not to use CPNI for marketing purposes. Should ISN elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

ISN has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI.

ISN has a process for disclosing information to customers. To ensure that the caller or the party requesting information on an account is in fact the person authorized to receive such information our representatives verify the last 4 numbers of the social security, the account number, the service and billing addresses. If all this information matched what ISN has on file, then ISN request's that the customer submits a written request for call records along with a copy of the account holder's Driver's License or Identification Card. If signatures matched then ISN discloses such records.

ISN has a special process for law-enforcement requests for customer records via subpoena. This includes checking with the sender of the subpoena to validate the currency of the subpoena. Then the information is sent by medium requested in the subpoena. All call records are sent only to the officer originating the subpoena and there is a special note added to the account stating that such documents where released to such officer.

ISN maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties where allowed access to CPNI.